

WEIL, GOTSHAL & MANGES LLP
Theodore Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (650) 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**SECOND STIPULATION BY AND
BETWEEN REORGANIZED
DEBTORS AND THE UNITED
STATES OF AMERICA REGARDING
DEADLINE FOR REORGANIZED
DEBTORS TO OBJECT TO CLAIMS**

[No Hearing Requested]

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
2 “**Utility**”), as reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the
3 Plan (as defined below), the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter**
4 **11 Cases**”), on the one hand, and the United States of America, on behalf of various federal
5 agencies (“**United States**,” and together with the Debtors and the Reorganized Debtors, the
6 “**Parties**”), on the other hand, by and through their respective counsel, hereby stipulate and agree
7 as follows:

8 RECITALS

9 A. On January 29, 2019, the Debtors commenced these Chapter 11 Cases in the United
10 States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”). The
11 Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Rule
12 1015(b) of the Federal Rules of Bankruptcy Procedure.

13 B. By Order dated June 20, 2020 [Dkt. No. 8053] (the “**Confirmation Order**”), the
14 Bankruptcy Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of*
15 *Reorganization Dated June 19, 2020* (as may be further modified, amended or supplemented from
16 time to time, and together with any exhibits or schedules thereto, the “**Plan**”)¹. The Effective Date
17 of the Plan occurred on July 1, 2020. *See* Dkt. No. 8252. Pursuant to Section 7.1 of the Plan (as
18 approved by Paragraph 31 of the Confirmation Order), the Reorganized Debtors may object to
19 Claims until the later of (i) one hundred and eighty (180) days after the Effective Date (i.e.,
20 December 28, 2020) and (ii) such later date as may be fixed by the Bankruptcy Court for cause
21 shown. Plan § 7.1.

22 C. On October 27, 2020, the Reorganized Debtors filed the *Motion for Entry of an*
23 *Order Extending Deadline for the Reorganized Debtors to Object to Claims* [Dkt. No. 9355],
24 which the Court granted with certain limited modifications in the *Order Extending Deadline for*
25 *the Reorganized Debtors to Object to Claims* [Dkt. No. 9563] (the “**First Extension Order**”).

27 ¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the
28 Plan or Confirmation Order.

1 The First Extension Order extended the Reorganized Debtors’ deadline under Section 7.1 of the Plan
2 to object to Claims by one hundred eighty (180) days, through and including June 26, 2021. The
3 First Extension Order extended the deadline for the Reorganized Debtors to object to **United States**
4 **Claims**—defined therein as Class 4B Utility General Unsecured Claims of the United States that
5 were identified by claim number and amount in Docket No. 9718, as required by the First Extension
6 Order—through and including March 31, 2021.

7 D. On March 17, 2021, the Reorganized Debtors filed the *Motion for Entry of an Order*
8 *Further Extending Deadline for the Reorganized Debtors to Object to Claims and for Related Relief*
9 [Dkt. No. 10409], which the Court granted with certain limited modifications in the *Order Further*
10 *Extending Deadline for the Reorganized Debtors to Object to Claims and Granting Related Relief*
11 [Dkt. No. 10494] (the “**Second Extension Order**”). The Second Extension Order further extended
12 the Reorganized Debtors’ deadline under Section 7.1 of the Plan to object to Claims by one hundred
13 eighty (180) days, through and including December 23, 2021. The Second Extension Order did not
14 address the United States Claims.

15 E. On March 25, 2021, the Parties filed a *Stipulation by and Between Reorganized*
16 *Debtors and the United States of America Regarding Deadline for Reorganized Debtors to Object to*
17 *Claims* [Dkt. No. 10459] (the “**First Stipulation**”), which the Court approved the same day [Dkt.
18 No. 10463]. The First Stipulation provided that the objection deadline for seven of the United States
19 Claims² would be extended to July 30, 2021, and that the objection deadline for the other three
20 United States Claims³ would be extended to September 30, 2021.

21 F. Since the time of the First Stipulation, the Parties have come to agreement as to one
22 United States Claim (No. 17112) and made progress towards resolution of others. To allow time for
23 continued progress towards resolution of the remaining United States Claims, the Parties believe that
24 it will be mutually beneficial to further extend the deadline for the Reorganized Debtors to object to
25 United States Claims, as set forth below.

26
27 ² Claim Nos. 59493, 59662, 59712, 63092, 63748, 62632, and 17112.

28 ³ Claim Nos. 59664, 63837, and 63756.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:

1. The objection deadline for the following United States Claims shall be October 1, 2021:

| Agency | Claim No. | Amount |
|---------------------------|-----------|----------------|
| U.S. Forest Service | 59493 | \$1,973,925.39 |
| National Park Service | 63748 | \$14,170.15 |
| Bureau of Land Management | 62632 | \$81,167.00 |

2. The objection deadline for the following United States Claims shall be November 1, 2021:

| Agency | Claim No. | Amount |
|-----------------------|-----------|-----------------|
| U.S. Forest Service | 59662 | \$9,895,433.65 |
| U.S. Forest Service | 59712 | \$19,466,029.49 |
| National Park Service | 63092 | \$3,763,144.49 |

3. The objection deadline for the following United States Claims shall be December 31, 2021:

| Agency | Claim No. | Amount |
|-----------------------|-----------|-----------------|
| U.S. Forest Service | 59664 | \$21,029,700.59 |
| U.S. Forest Service | 63837 | \$76,554,779.95 |
| National Park Service | 63756 | \$90,415.07 |

4. This Stipulation shall constitute the entire agreement and understanding of the Parties relating to the subject matter hereof and shall supersede all prior agreements and understandings relating to the subject matter hereof.

1 5. This Stipulation may be executed in counterparts, each of which shall be deemed an
2 original, but all of which together shall constitute one and the same agreement.

3 6. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
4 controversies arising from this Stipulation or any Order approving the terms of this Stipulation.
5

6
7 Dated: July 26, 2021

8 KELLER BENVENUTTI KIM LLP

9 /s/ David A. Taylor

10 David Taylor
11 *Attorneys for Debtors and*
12 *Reorganized Debtors*

/s/ Matthew J. Troy

BRIAN M. BOYNTON
Acting Assistant Attorney General
Civil Division
RUTH A. HARVEY
Director
KIRK MANHARDT
Deputy Director
MATTHEW J. TROY
Senior Trial Counsel
Attorneys for the United States